

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

FRONTIER AIRLINES, INC.

Case No.: 1:20-cv-09713-LLS

Plaintiff,

**PLAINTIFF'S DEPOSITION  
DESIGNATIONS WITH  
DEFENDANTS' OBJECTIONS AND  
PLAINTIFFS' RESPONSES**

v.

AMCK AVIATION HOLDINGS IRELAND  
LIMITED, ACCIPITER INVESTMENT 4  
LIMITED, VERMILLION AVIATION  
(TWO) LIMITED, WELLS FARGO TRUST  
COMPANY, N.A., solely in its capacity as  
OWNER TRUSTEE, and UMB BANK,  
N.A., solely in its capacity as OWNER  
TRUSTEE,

Defendants.

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**PLAINTIFF'S DEPOSITION DESIGNATIONS**

Pursuant to Federal Rule of Civil Procedure 26(a)(3), Plaintiff Frontier Airlines, Inc. submits its Deposition Designations, along with Defendants' Objections and Plaintiff's Responses. Below is the testimony that Frontier expects to present by deposition:

**1. Fabian Bachrach – Deposition Date March 15, 2022**

<b>Fabian Bachrach   Page:Line</b>	<b>Defendants' Objection</b>	<b>Plaintiff's Response</b>
8:22-25		
10:24-11:19		
30:6-32:22		
58:11-17		
74:16-75:20		
8:22-25		
86:11-23		
86:25-87:6		
97:4-98:12		

**2. Francis Lee – Deposition Date April 29, 2022**

<b>Francis Lee   Page:Line</b>	<b>Defendants' Objection</b>	<b>Plaintiff's Response</b>
7:4-7		
7:25-8:1		
8:7-8:12		
10:6-23		
11:10-12:6		
13:11-13:25	14:1-17 should in fairness be included.	Disagree. FRE 402 Relevance.
14:18-15:4	15:5-13 should in fairness be included.	Disagree. FRE 403 Cumulative.
15:14-16:2	16:3-17:4 should in fairness be included.	Disagree. FRE 402 Relevance; FRE 403 Wasting Time.
21:25-22:4		
22:6-16		
24:3-25:9		
26:23-28:8		
34:13-35:4		
38:18-39:6		
43:24-45:3		
46:1-47:13		
47:23-49:3		
68:3-16		
70:12-17		
72:1-77:1	77:4-12 should in fairness be included.	Disagree. FRE 402 Relevance; FRE 403 Wasting Time.
77:13-78:16		
79:2-4		
107:16-108:10	108:11-19 should in fairness be included.	Disagree. Move to strike as non-responsive.

**3. Gerald Ma – Deposition Date April 27, 2022**

<b>Gerald Ma   Page:Line</b>	<b>Defendants' Objection</b>	<b>Plaintiff's Response</b>
9:16-19		
10:3-4		
10:8-9		
11:12-15		
12:15-23		
13:9-24		
14:4-17		
15:11-14		

Gerald Ma   Page:Line	Defendants' Objection	Plaintiff's Response
16:17-17:1		
18:4-12		
18:22-19:6		
19:10-15		
19:24-20:1		
23:9-24:18		
26:9-27:1	25:18-26:6 should in fairness be included.	Disagree. Move to strike as non-responsive.
27:12-14		
28:8-25		
31:10-32:4	32:5-14 should in fairness be included.	Disagree. Move to strike as non-responsive.
35:22-36:6	36:7-37:5 should in fairness be included.	Disagree. FRE 402 Relevance; FRE 403 Wasting Time.
38:13-20		
38:22-24		
39:6-12		
40:7-40:22		
41:17-42:7		
44:22-45:23		
46:3-48:1		
53:17-54:8		
54:11-63:6		
68:9-25		
69:14-70:2		
70:7-74:3		
75:4-76:3		
76:11-77:4		
78:5-23		
80:24-81:14		
81:17-82:10	Document discussed has not been identified as a trial exhibit.	Disagree. Identical text is included in Joint Trial Ex. 78.
83:13-84:2		
84:5-85:7		
85:13-88:11		
90:3-91:3		
92:13-93:24		
96:6-13		
96:24-98:17		
100:13-102:5		
102:16-103:6		
104:23-106:16		

Gerald Ma   Page:Line	Defendants' Objection	Plaintiff's Response
107:21-109:11		
110:16-20		
110:22-111:11		
111:13-24		
112:12-113:21	Document discussed has not been identified as a trial exhibit	Disagree. This is Joint Trial Ex. 101.
114:17-116:23		
117:5-20		
118:6-15		
118:19-120:21		
122:1-21		
125:7-10		
125:24-127:2	This is an incomplete question without an answer and should be withdrawn	Scrivener's error corrected and resolves objection.
131:2-7	130:8-25 should in fairness be included.	Disagree. Move to strike as non-responsive.
136:20-138:25		
139:9-140:15	139:1-6 should in fairness be included.	Disagree. Move to strike as non-responsive.
144:12-145:10		
145:14-146:9		
146:25-149:16		
150:13-153:2		
154:1-158:15		
158:22-161:10		
162:8-164:6		
165:3-166:1		
168:14-20		
171:2-23		
172:24-173:15		
174:4-175:5		
175:7-176:2		
177:2-178:6	176:3-24 should in fairness be included.	Disagree. Move to strike as non-responsive.
177:2-12		
177:14-178:6		
178:23-179:2		
180:2-181:1		
182:21-183:25		

**4. Michael McInerney – Deposition Date March 11, 2022**

<b>Michael McInerney   Page:Line</b>	<b>Defendants' Objection</b>	<b>Plaintiff's Response</b>
10:1-4		
12:18-14:5		
14:13-15:25		
16:1-16		
19:3-20:21		
21:2-22:1		
23:5-11	22:9-23:4 should in fairness be included.	Disagree. FRE 402 Relevance; FRE 403 Wasting Time.
23:22-24:8	23:12-21 should in fairness be included	Disagree. FRE 402 Relevance; FRE 403 Wasting Time.
26:3-17		
27:22-24		
28:23-29:16		
31:21-32:14		
38:14-21		
40:15-21		
42:18-43:15		
50:3-9		
51:5-11		
52:8-14		
53:25-54:4		
55:22-56:11		
59:7-60:2		
62:19-25		
63:19-63:24		
66:3-67:12		
69:1-71:21		
94:25-95:10		
95:15-96:21		
96:23-97:15		
97:18-99:18		
99:20-100:22		
103:4-105:13		
108:21-109:15		
131:24-132:3		
132:5-12		
134:1-19		

**5. Ronan Murphy – Deposition Date March 21, 2022**

<b>Ronan Murphy   Page:Line</b>	<b>Defendants' Objection</b>	<b>Plaintiff's Response</b>
6:9-12		
8:24-10:2		
10:19-11:5		
12:17-25		
16:4-17		
17:22-18:3		
18:7-19:2		
19:5-18		
21:2-4		
21:22-23:2		
26:13-27:7		
51:22-52:10		
55:15-25		
77:6-16	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
78:4-22	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
79:18-83:5	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
92:10-94:25		
106:9-10	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
108:19-110:24	Document discussed has not been identified as a trial exhibit; 102:9-103:10 should in fairness be included.	Testimony is relevant and admissible; Willing to add 102:9-15, other portions excluded under FRE 403 Wasting Time.
135:21-136:4	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
136:20-137:18	Document discussed has not been identified as a trial exhibit; 136:5-19 should in fairness be included	Testimony is relevant and admissible; FRE 403 Wasting Time.

**6. Jane O’Callaghan – Deposition Date March 23, 2022**

<b>Jane O’Callaghan   Page:Line</b>	<b>Defendants’ Objection</b>	<b>Plaintiff’s Response</b>
6:7-11		
7:4-13		
9:2-12		
9:22-11:3		
11:7-12:2		
17:4-18:10		
19:19-23:5		
25:3-19	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
33:6-38:6		
38:13-40:11		
41:23-42:5		
44:15-45:21		
52:19-53:14		
55:11-56:5		
56:15-58:7		
62:8-22		
63:11-64:24		
65:2-8		
66:4-67:22		
68:7-70:21		
70:22-71:11		
72:4-76:4		
78:12-80:19		
82:3-84:25		
86:23-91:6	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
94:3-17	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
95:16-97:5	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
97:14-15	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
97:22-99:4	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
101:19-104:16		

<b>Jane O'Callaghan   Page:Line</b>	<b>Defendants' Objection</b>	<b>Plaintiff's Response</b>
104:24-106:4	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
107:25-110:22		
111:5-112:10		
112:17-117:20		
118:14-120:9		
120:20-121:25		
123:15-125:7		
125:8-128:4	128:5-128:22 should in fairness be included.	Disagree. FRE 402 Relevance; FRE 403 Wasting Time.
128:23-133:10		
133:13-135:3		
137:3-138:4		
138:11-19		
139:4-144:23		
145:8-146:6		
147:12-148:12		
148:19-150:20	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
151:18-152:8		
153:9-154:8		
161:4-162:19		
169:18-170:14		
170:19-177:4		
178:18-179:25	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
180:8-20		
181:10-184:3		
184:15-187:22		
188:2		
192:2-11		
194:8-196:3	195:23-196:3 This is a question without answer and should be withdrawn.	Disagree. The question continues and completes at 197:8-10, which is designated below along with the answer at 197:11-13.
197:8-13		
202:14-18		



<b>Jane O'Callaghan   Page:Line</b>	<b>Defendants' Objection</b>	<b>Plaintiff's Response</b>
204:10-14		
205:18-209:15	209:16-209:24 should in fairness be included	Disagree. Move to strike as non-responsive.
210:4-8		
210:15-24	210:25-211:8 and 211:14-18 should in fairness be included.	Disagree. FRE 402 Relevance; FRE 403 Wasting Time, Confusing.
211:19		
212:16-216:3		
217:2-221:9		
222:9-13		
222:24-223:19		
224:21-226:10		
229:4-7		
239:8-240:10	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
240:22-25	Document discussed has not been identified as a trial exhibit	Testimony is relevant and admissible.
245:9-247:4	Inadmissible under Federal Rule of Evidence 408.	Disagree. FRE 408 does not preclude this exhibit. Contents of this exhibit are already part of the case record. Any such objection has been waived.
248:18-254:16	Inadmissible under Federal Rule of Evidence 408.	Disagree. FRE 408 does not preclude this exhibit. Contents of this exhibit are already part of the case record. Any such objection has been waived.
256:19-24		
257:2-8		
257:16-259:21		

DATED: March 25, 2024

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